

I support media diversity

I am writing to you today to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. In its goals to promote competition, diversity and localism in today's media market, I strongly believe that the FCC should retain all of the current media ownership rules now in question. These rules serve the public interest by limiting the market power of already huge companies in the broadcast industry.

An increasingly consolidated media structure leads to a diminished range of debate, and lower journalistic quality.

When free market profiteers own media outlets, their output becomes beholden to advertising interests—the largest source of revenue in the realm of television and radio. Empirical evidence demonstrates that such outlets are unlikely to provide critical coverage of important advertisers or of subsidiary divisions of the media outlet's corporate parent. Likewise, these outlets are apt to tailor coverage to suit the needs of their advertisers' key demographic (wealthy consumers) and largely ignore stories pertinent to the poor.

Similarly, big media outlets have a vested interest currying good favor with the powerful political bodies that regulate consolidation, and politicians who pour huge quantities of money into broadcast campaign ads. This has allowed government line politics to proliferate the conglomerated airwaves, and has undermined a diverse range of reporting and opinion.

In an effort to generate high revenue while keeping costs low, conglomerated media outlets present homogenous, trivialized news. To stimulate ratings, broadcasters have adopted "infotainment" news models, which emphasize fluff journalism and shy away hard news in an effort to propagate the "buying mood" over commercial free periods. Cost cutting measures include pervasive syndication across formats, and substituting blind trust in official press releases for real reporting. The outcome is a homogenous, superficial media that avoids controversy.

Finally, conglomerated media's semi-monopoly status utterly undermines the spirit of creative competition that is at the basis of a successful free market. While multiple media companies will likely always exist, there is little compelling them to present significantly different information; in the oligopoly that will result from further deregulation, "diversity" will be based on synthetic criteria. Namely, ratings will determine which content paradigms media companies ape. Once several top companies have gained a stranglehold on the media market, introducing new, meaningful competition will become effectively impossible.

True democracy relies on a populace armed with informed consent. A deregulated, hyper-conglomerated media will not provide the full spectrum of information necessary for informed participation. It is committed to serving only bottom line business interests, and has ample power to squelch possible competition.

I do not believe that the studies commissioned by the FCC accurately demonstrate the negative affects media deregulation and consolidation have had on media diversity. While there may be indeed be more sources of media than ever before, the spectrum of views presented have become more

limited.

The right to carry on informed debate and discussion of current events is part of the founding philosophy of our nation. Our forefathers believed that democracy was best served by a diverse marketplace of ideas. If the FCC allows our media outlets to merge, our ability to have open, informed discussion with a wide variety of viewpoints will be compromised.

The public interest will best be served by preserving media ownership rules in question in this proceeding.

It is important for the FCC to not only consider the points of view of those with a financial interest in this issue, but also those with a social or civic interest.

With the serious impact these rule changes will have on our democracy, it is incumbent on the Commission to take the time to review these issues more thoroughly and allow the American people to have a meaningful say in the process.

Sincerely,

Zachary Sultan
Editor-in-Chief
Berkeley High School Jacket